

LAW OFFICES OF IAN L. MATTOCH

IAN L. MATTOCH 898-0  
EMILY KAWASHIMA WATERS 6498-0  
STUART M. KODISH 4698-0  
Suite 1835, Pacific Guardian Center  
737 Bishop Street  
Honolulu, Hawai'i 96813  
Telephone: (808) 523-2451

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

THE ESTATE OF ERIK A. POWELL, ) CIVIL NO. CV04-00428 LEK  
THROUGH PERSONAL )  
REPRESENTATIVE MARY K. ) PLAINTIFFS' MOTION TO  
POWELL; THE ESTATE OF JAMES D. ) EXCEED LIMIT ON  
LAUGHLIN, THROUGH PERSONAL ) DEPOSITIONS UPON ORAL  
REPRESENTATIVE RAGINAE C. ) EXAMINATION;  
LAUGHLIN; MARY K. POWELL, ) MEMORANDUM IN SUPPORT  
INDIVIDUALLY; RAGINAE C. ) OF MOTION; DECLARATION  
LAUGHLIN, INDIVIDUALLY; CHLOE ) OF COUNSEL; EXHIBITS "1" –  
LAUGHLIN, A MINOR, THROUGH ) "2"; CERTIFICATE OF  
HER NEXT FRIEND, RAGINAE C. ) SERVICE  
LAUGHLIN, )  
)

Plaintiffs, )  
)

vs. )  
)

CITY AND COUNTY OF HONOLULU, )  
)

Defendant. )  
)

and )  
)

TRIAL: April 3, 2007

CITY AND COUNTY OF HONOLULU, )  
)  
Third-Party Plaintiff, )  
)  
vs. )  
)  
UNIVERSITY OF HAWAII, a body )  
corporate; JOHN DOES 1-10, JANE )  
DOES 1-10, DOE CORPORATIONS and )  
DOE ENTITIES, )  
)  
Third-Party Defendants.)  
\_\_\_\_\_ )

PLAINTIFFS' MOTION TO EXCEED LIMIT ON DEPOSITIONS  
UPON ORAL EXAMINATION

Come now Plaintiffs THE ESTATE OF ERIK A. POWELL,  
THROUGH PERSONAL REPRESENTATIVE MARY K. POWELL; THE  
ESTATE OF JAMES D. LAUGHLIN, THROUGH PERSONAL  
REPRESENTATIVE RAGINAE C. LAUGHLIN; MARY K. POWELL,  
INDIVIDUALLY; RAGINAE C. LAUGHLIN, INDIVIDUALLY; CHLOE  
LAUGHLIN, A MINOR, THROUGH HER NEXT FRIEND, RAGINAE C.  
LAUGHLIN (hereinafter "Plaintiffs"), by and through their attorneys, The Law  
Offices of Ian L. Mattoch, and hereby move this Court for an order allowing  
Plaintiffs to exceed the limit on the number of depositions upon oral examination  
pursuant to Fed. R. Civ. P. 30.

This motion is based upon the records and files herein, Federal Rules of Civil Procedure 26(b)(2), 30(a)(2)(A), the memorandum in support of motion, and the declaration of counsel and exhibits attached hereto and made a part hereof.

DATED: Honolulu, Hawai'i, February 14, 2007.

/s/ Emily Kawashima Waters

IAN L. MATTOCH

EMILY KAWASHIMA WATERS

Attorneys for Plaintiffs